UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON SEPTEMBER 11, 2001 03 MDL:No. 1570 (GBD)

This document relates to:

All cases

Affidavit of Joan Molinaro

I, Joan Molinaro, state the following:

- 1. I am the mother of Carl Eugene Molinaro, who was a New York firefighter and member of Ladder Co. 2. He was last glimpsed helping survivors to escape from the North Tower of the World Trade Center. I tragically lost my son in the September 11 attacks when al Qaeda terrorists hijacked and crashed American Airlines Flight 11 into the North Tower.
- 2. My family decided to pursue an avenue of civil litigation with the aim of accounting for how terrorists are financially and otherwise enabled to commit their uncivilized, barbaric attacks, and disabling or de-incentivizing those involved in that process.
- 3. I, along with the many families of others killed on September 11, 2001, initiated this lawsuit in 2002, in order to obtain some measure of justice for my son's death, to hold accountable those whose intentional acts facilitated the attacks, and to the extent possible, prevent it from happening again.
- 4. It has been nearly 8 years since we filed of this lawsuit, and I understand that the claims against nearly all of the defendants still have not proceeded beyond initial motions stage and the Court has prevented the plaintiffs from learning even the most basic information about the defendants, including information about a number of defendants that have been designated as terrorists by the U.S. government for years.
- 5. I fear that continued delays in this litigation will prevent me from ever seeing justice for my murdered son during my lifetime.

I declare under penalty of perjury that the foregoing statements are true and correct, based on my knowledge, information and belief.

Executed on February 1, 2010
Hawley, Pennsylvania

JOAN MOLINARO